

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

AMEREN TRANSMISSION COMPANY OF ILLINOIS)	
)	
Petition for a Certificate of Public Convenience and)	
Necessity, pursuant to Section 8-406.1 of the Illinois)	
Public Utilities Act, and an Order pursuant to Section 8-)	Docket No. 12-0598
503 of the Public Utilities Act, to Construct, Operate and)	
Maintain a New High Voltage Electric Service Line and)	
Related Facilities in the Counties of Adams, Brown,)	
Cass, Champaign, Christian, Clark, Coles, Edgar, Fulton,)	
Macon, Montgomery, Morgan, Moultrie, Pike,)	
Sangamon, Schuyler, Scott and Shelby, Illinois.)	

**AMEREN TRANSMISSION COMPANY OF ILLINOIS' MOTION FOR
ENTRY OF A CASE MANAGEMENT ORDER AND COORDINATED SCHEDULE**

Ameren Transmission Company of Illinois (ATXI), pursuant to Section 10-101.1(d) of the Public Utilities Act (Act), 220 ILCS 5/10-101(d), and 83 Illinois Administrative Code Sections 200.25, 200.190, 200.360, 200.370 and 200.500, respectfully requests issuance of a case management order adopting the case management plan and schedule reflected in the attached Proposed Case Management Order. In support of this motion, ATXI states:

1. On November 7, 2012, ATXI filed with the Illinois Commerce Commission (ICC or Commission) a petition pursuant to Sections 8-406.1 and 8-503 of the Public Utilities Act, 220 ILCS 5/8-406.1, 8-503, initiating the instant certificate of public convenience and necessity (CPCN) proceeding. ATXI is seeking the Commission's approval to construct, operate and maintain a new electric transmission line and related facilities (collectively, the Project) in areas of the State of Illinois. (See generally ATXI Pet.).

2. The attached proposed Case Management Order establishes a case schedule, an efficient discovery process, and other procedures that will allow the Commission to enter a final order in the case within the 225-day statutory period (including the statutory extension period of

75 days). 220 ILCS 5/8-406.1(g).

3. The Act and the Illinois Administrative Code encourage entry of case management orders. Section 10-101.1 of the Act allows parties to submit a case management memorandum that addresses, among other things, schedules for pre-hearing conferences and evidentiary hearings, discovery procedures and limitations on discovery. 220 ILCS 5/10-101.1(d).

4. Section 200.370 of the Administrative Code vests the Administrative Law Judges (ALJs) with authority to limit, condition, or otherwise regulate discovery. 83 Ill. Adm. Code § 200.370.

5. Section 200.360(c) of the Administrative Code expressly provides that discovery tools may be utilized in Commission proceedings in the same manner contemplated by the Rules of the Supreme Court of Illinois. 83 Ill. Adm. Code § 200.360(c).

6. ATXI anticipates that there will be significant discovery in this proceeding by Staff and other parties, as has been the case in other proceedings related to large-scale transmission projects. ATXI proposes that all parties in this proceeding, including Staff, use best efforts to respond to discovery more quickly than is otherwise allowed by rule, and adhere to the expedited discovery time frames set forth in the Case Management Order. The proposed Case Management Order requires parties to make a good faith effort to respond to data requests as quickly as is practicable.

7. The proposed Case Management Order contains various other provisions that will promote certainty, clarity and efficiency in the administration of this proceeding. It is similar to case management plans approved by the Commission in other large-scale proceedings. See, e.g., Ameren Ill. Co., Docket 11-0282, Notice of ALJ Ruling (Case Management Plan) (Apr. 27,

2011). Given the scope of the present case, ATXI believes such a case management plan is appropriate here as well.

8. The proposed case schedule and discovery timelines have been agreed to by ATXI and ICC Staff.

WHEREFORE, for all the reasons set forth above, ATXI respectfully requests entry and approval of the Proposed Case Management Order.

Dated: November 30, 2012

Respectfully submitted,

Ameren Transmission Company of Illinois

/s/ Albert Sturtevant

One of their Attorneys

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CERTIFICATE OF SERVICE

I, Albert Sturtevant, an attorney, certify that on November 30, 2012, I caused a copy of the foregoing *Ameren Transmission Company of Illinois' Motion for Entry of a Case Management Order and Coordinated Schedule* to be served by electronic mail to the individuals on the Commission's Service List for Docket 12-0598.

/s/ Albert Sturtevant

Attorney for Ameren Transmission
Company of Illinois

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PROPOSED CASE MANAGEMENT ORDER

On November 7, 2012, ATXI filed with the Illinois Commerce Commission (ICC or Commission) a petition seeking a Certificate of Public Convenience and Necessity, pursuant to Section 8-406.1 of the Public Utilities Act (Act), 220 ILCS 5/8-406.1, and an order pursuant to Section 8-503 of the Act, to construct, operate and maintain a new 345 kV transmission line and related facilities in areas of Illinois. In accordance with Section 10-101.1 of the Act and 83 Illinois Administrative Code Sections 200.190, 200.370 and 200.500, the Administrative Law Judges (ALJs) hereby establish the following Case Management Plan:

I. Form of Pleadings

Recognizing that the electronic filing of documents promotes efficiency in practice, parties are authorized to electronically file pleadings and supporting documents. Service of paper copies of pleadings, formal filings, or prepared testimony is not required and is, in fact, generally discouraged. Filed documents shall be served electronically on parties in accordance with the Rules of Practice contained in 83 Illinois Administrative Code Section 200.1050. Unless otherwise specified, service must be received electronically no later than the date of the filing deadline, at the same time the documents are filed on e-Docket, or as soon as practicable

thereafter. All items served via e-mail shall contain the docket number within the subject line.

The ALJs must be served with an electronic copy of all pleadings, prepared testimony and briefs in Microsoft Word (.doc or .docx) format.

II. Discovery Requests and Responses

A. General Provisions Regarding Data Requests

Upon issuance, each data request should identify the witness, exhibit, prior request or schedule to which it is being directed, to the extent known. If containing subparts, the subparts within the data request should be specifically identified and numbered or otherwise labeled.

Notwithstanding Section 200.410 of Part 200, Staff and each party shall use best efforts to respond (i) within 14 calendar days for data requests issued before the date of filing of Staff and Intervenor direct testimony; (ii) within 7 calendar days for data requests issued by ATXI from the date of filing of Staff and Intervenor direct testimony to the date of the filing of ATXI's surrebuttal testimony; (iii) within 10 calendar days for data requests issued by Staff or any party other than ATXI from the date of filing of Staff and Intervenor direct testimony to the date of the filing of ATXI's surrebuttal testimony; and (iv) within 3 calendar days after the date of the filing of ATXI's surrebuttal testimony until the close of discovery. To the extent that a data request has a response date that falls on a weekend or Illinois state holiday when state agencies are closed, the response date shall be the first business day after said weekend or holiday, and the responding party shall use best efforts to transmit said response by 12 pm CST on said first business day. In the event that the recipient of a data request believes that additional time is necessary to respond to any particular request, the concerned parties shall attempt to negotiate a mutually agreeable alternative response time. Staff and each party shall, in good faith, attempt to respond to data requests as soon as responses are prepared. To facilitate an efficient discovery

process, care should be taken to avoid duplicative data requests. In accordance with 83 Illinois Administrative Code Section 200.350, parties must consult and make reasonable attempts to resolve differences in any discovery disputes before filing a motion to compel discovery or invoking Section 200.370.

Each data request response shall clearly identify the individual or individuals who prepared the response. The telephone number and job title of the individual(s) shall also be provided. In the event more than one person assists in the preparation of the response, each person shall be identified with a clear indication of what portion of the response he or she prepared. The individual(s) identified as having prepared the response shall be knowledgeable about the response and competent to respond to discovery and cross-examination questions regarding the response.

Signing or otherwise providing one's name as the individual(s) responding to a data request shall be construed to mean that the identified individual(s) prepared the response or directed that the response be prepared under his or her direction and control, has personal knowledge of the information stated in the response, and that the response is true, correct, and complete to the best of his or her knowledge and belief.

B. Electronic Discovery

The discovery process is more efficient through the electronic exchange of information between and among parties to matters pending before the Commission. Accordingly, data requests shall be sent electronically in Microsoft Word (.doc or docx) format, to all parties. Hardcopies of responses will be provided to the party that issues a data request if that party requests such a response when submitting the data request, attests to their inability to receive the data requests electronically, and agrees to a delay, of one to three days depending on the nature

and extent of the request, in providing responses to accommodate the additional time required for mailing. ATXI data request responses will also be made available to Staff and all intervening parties on a private extranet network, securely accessible using a password provided by ATXI. Delivery of specific data request responses by ATXI will not otherwise be required, except upon request by the party that issues the data request, made in accordance with this Order. Responses to every data request, regardless of who made the data request, shall be served upon Commission Staff either electronically or by hardcopy, if so requested. Electronic documents provided in response to data requests shall be transmitted either in the native format of the document if the document was created in Microsoft Excel (.xls or .xlsx) or in searchable Adobe Acrobat (.pdf) format. Where material is available in Microsoft Excel format, the material shall be transmitted electronically in native format, unprotected, and with working formulae intact. Data requests and responses thereto shall not be filed or sent to the ALJs.

C. Protected Materials

When information or material provided has been identified as confidential, such information shall be made available to another party in accordance with the Terms Governing Protection of Confidential Information or any other Protective Order issued in this proceeding.

III. Hearings

Witnesses who submit prefiled testimony in this proceeding are expected to be made available in person for cross-examination at the evidentiary hearing. In preparation for hearing, each party shall be required to identify the witnesses they intend to cross-examine and provide the ALJs an estimate of the amount of cross-examination time. Parties will be expected to conduct cross-examination within the estimated time frames.

IV. Schedule

The following schedule will apply in this proceeding:

Activity	Day of the Week	Date	Days Since Last Activity
Petition filed		11/7/12	
S/I Direct	Thursday	1/31/13	85
Company Rebuttal	Thursday	2/28/13	28
S/I Rebuttal	Thursday	3/14/13	14
Company Surrebuttal	Thursday	3/21/13	7
Status Hearing	Friday	3/22/13	1
Evidentiary Hearing	Tuesday - Thursday	3/26—3/28 (3/29, if needed)	4
Initial Briefs	Friday	4/12/13	15
Reply Briefs	Friday	4/19/13	7
Draft order	Monday	4/22/13	3
ALJPO	Thursday	5/9/13	17
BOE	Friday	5/17/13	8
RBOE	Friday	5/24/13	7
Deadline*	Thursday	6/20/13	27

* There are two ICC meetings between 5/31/13 and 6/20/13, including a regular open meeting scheduled for 6/18/13.

Dated this _____ day of December 2012.

Administrative Law Judge